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BY ECF

The Honorable Lorna G. Schofield
U.S. District Court for the Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Cypress Holdings, III, L.P. v. Hall*, No. 1:22-cv-1243 (LGS)

Dear Judge Schofield:

We represent Sport-BLX, Inc., Sport-BLX Securities, Inc., Clinton Group, Inc., George Hall, Cesar Baez, and Christopher Johnson (the “Sport-BLX Parties”) in the above-referenced action. We write, together with counsel for GlassBridge Enterprises, Inc., Francis Ruchalski and Daniel Strauss (collectively, the “GlassBridge Defendants”) and counsel for Joseph De Perio, regarding the pre-motion conference summary judgment letters to be submitted on October 8, 2024 (the “Letters”) pursuant to Your Honor’s September 24, 2024 Order (Dkt. No. 181), to request a page-limit extension for the Letters. Such an extension is needed to provide the Court with a meaningful outline of the summary judgment motions contemplated by the Defendants.

Although the Court’s September 23, 2024 Opinion and Order (Dkt. No. 180) narrowed the scope of the claims in the Second Amended Complaint, numerous direct and derivative claims remain for which Defendants seek summary judgment. Previously, the Defendants addressed these claims in two pre-motion letters dated September 27, 2023 (Dkt. Nos. 140 & 142). Pursuant to leave granted by Your Honor (Dkt. No. 138), those letters covered eight pages (six from the Sport-BLX Parties and two from the GlassBridge Defendants).¹ Because the arguments for summary judgment largely remain the same, the Defendants respectfully request that a similar extension of page limits be granted: the Sport-BLX Parties, together with Defendant Joseph De Perio, to submit a joint letter not to exceed six pages; and the GlassBridge Defendants to submit a letter not to exceed two pages. Altogether, the Rule 56 pre-motion letters

¹ The Court deferred consideration of those summary judgment motions pending determination of the Rule 23.1 motion.

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will not exceed eight pages in length for the ten Defendants. We believe these enlarged page limits will assist the Court in conducting a meaningful pre-motion conference.

Respectfully submitted,

/s/ Jonathan S. Sack
Jonathan S. Sack

cc: Counsel of record (by ECF)